EXHIBIT B

Friday, September 5, 2025 at 10:48:00 Eastern Daylight Time

Subject: Rapaport v. Finkelman, No. 1:25-cv-07294
Date: Friday, September 5, 2025 at 10:47:57 AM Eastern Daylight Time
From: Max Rodriguez
To: Gideon Rapaport
Attachments: image002.png

Mr. Rapaport,

I learned this morning that you have filed a new lawsuit against Ms. Finkelman seeking what you purport to be declaratory relief concerning your liability for mandatory attorney's fees under Civil Rights Law 70-a. This lawsuit is frivolous, vexatious, and is representative of your abuse of the legal system to harass Ms. Finkelman.

Per Judge Clarke's individual rule 4(i), I am informing you that, unless you voluntarily dismiss this new action under Fed. R. Civ. P. 41(a)(1)(A), and provide proof that you have done so today, then no later than 2pm EST today, I will be filing a motion for a temporary restraining order in the existing case, No. 24-cv-5942, to request a filing injunction barring you from filing any new pleadings, motions, or other filings with respect to Ms. Finkelman without prior leave of the Court.

If you do not agree to voluntarily dismiss your complaint or consent to the proposed TRO, please respond to inform me so I may note that to the Court. Furthermore, I will be requesting a hearing on the proposed motion as soon as practicable for the Court, either later today or Monday September 8.

I will be informing the Court of the same by letter, attaching this email thereto.

Sincerely,

MAX RODRIGUEZ
Principal and Founder
(he/him/his)

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